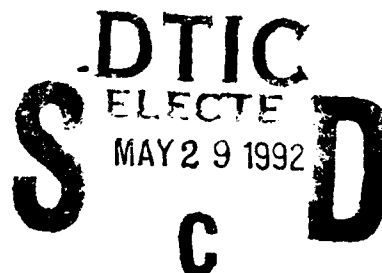


AD-A251 005



①

## ENVIRONMENTAL ASSESSMENT

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**BEARDSTOWN EMERGENCY DREDGING ACTION**

**RM 87.7, LB, ILLINOIS RIVER**

**CASS COUNTY, ILLINOIS**

**FEBRUARY 1992**

DISTRIBUTION STATEMENT A

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**US Army Corps  
of Engineers**  
Rock Island District

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DEPARTMENT OF THE ARMY  
ROCK ISLAND DISTRICT, CORPS OF ENGINEERS  
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ROCK ISLAND, ILLINOIS 61204-2004

ENVIRONMENTAL ASSESSMENT

BEARDSTOWN EMERGENCY DREDGING ACTION  
RM 87.7, LB, ILLINOIS RIVER  
CASS COUNTY, ILLINOIS



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FEBRUARY 1992

ENVIRONMENTAL ASSESSMENT  
BEARDSTOWN EMERGENCY DREDGING ACTION  
RM 87.7, LB, ILLINOIS RIVER  
CASS COUNTY, ILLINOIS

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ATTACHMENT:  
Clean Water Act, Section 404(b)(1) Evaluation

DISTRIBUTION LIST

## ENVIRONMENTAL ASSESSMENT

### BEARDSTOWN EMERGENCY DREDGING ACTION RIVER MILE 87.7, LB, ILLINOIS RIVER CASS COUNTY, ILLINOIS

#### I. PURPOSE AND NEED FOR ACTION

A. Project Authority. Maintenance dredging responsibility on the Illinois Waterway, within the Rock Island District, Corps of Engineers boundary, encompasses River Miles (RM) 80.0 to 327.0. Authority for such dredging, and thus this project, is given under the Illinois Waterway Nine-Foot Channel Navigation project.

Following the requirements of the National Environmental Policy Act of 1969, this Environmental Assessment (EA) was prepared to address impacts associated with utilization of a new dredged material placement site on the Illinois Waterway. The EA also includes an evaluation under Section 404(b)(1) of the Clean Water Act.

B. Background Information. The dredging activity addressed in this EA involves RM 87.5-88.6 below the confluence with the Sangamon River (figure EA-1). The Sangamon in recent years has carried a large silt load, and, in this instance, the load may have been exacerbated by a recent, unusually large rainfall in the Sangamon watershed. The area has been dredged almost yearly since 1987, and this pattern is expected to continue in the future.

#### II. PROJECT DESCRIPTION

Due to rapid and severe shoaling resulting from the circumstances just described, it was determined from sounding data that the navigation channel had been reduced below 9 feet. Additionally, the site has a history of not rescouring by natural means. The threat that this situation posed to commercial navigation, along with possible hazardous consequences to human life and property, warranted an emergency declaration by the Rock Island District Engineer.

This declaration necessitated the use of a proposed placement site before a full NEPA assessment could be completed, as provided for in ER 200-2-2, 33 CFR 230.8. This EA thus will describe the action taken and its implications for future management of dredged material in this location.

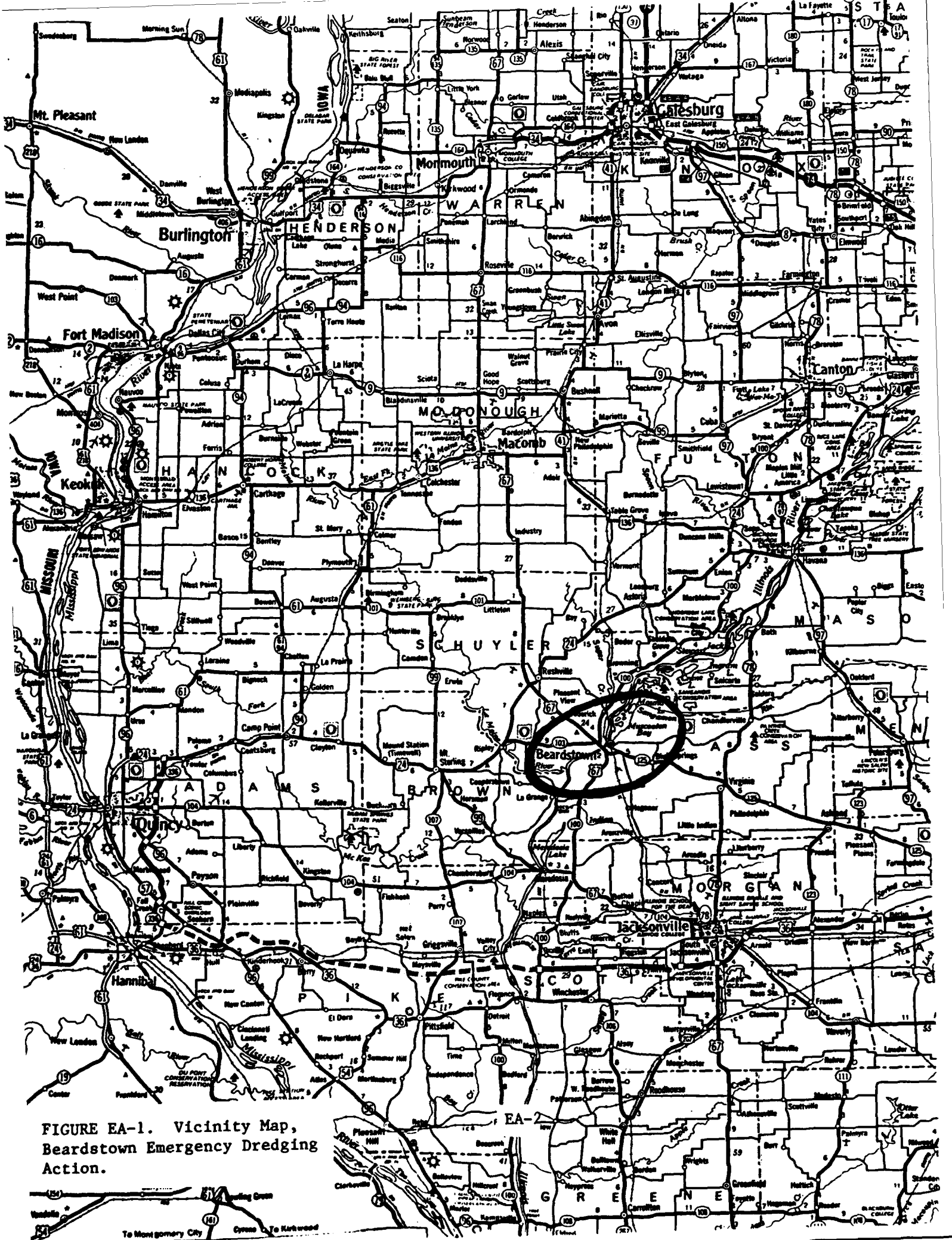


FIGURE EA-1. Vicinity Map,  
Beardstown Emergency Dredging  
Action.

The placement site utilized is at approximate RM 87.4-87.7, left descending bank, at Beardstown, Cass County, Illinois (sec. 16, T. 18 N., R. 12 W.). The configuration is linear, approximately 60-100 feet by 2,000 feet, comprising approximately 3.7 acres (figure EA-2). The site was viewed by the Illinois On-Site Inspection Team (OSIT) in early April 1991, with representatives present from the Illinois Department of Transportation (Division of Water Resources); Illinois Natural History Survey; Illinois Environmental Protection Agency; U.S. Fish and Wildlife Service; U.S. Environmental Protection Agency; Illinois Department of Conservation; and U.S. Army Corps of Engineers.

Dredging commenced on June 19, 1991, using the 20-inch cutterhead dredge THOMPSON of the St. Paul District, Corps of Engineers. The operation was completed on June 24, 1991, with approximately 57,600 cubic yards of material being deposited on the site. The dredged volume, being substantially larger than anticipated, was placed entirely along the shoreline, and is estimated to have encroached to a maximum distance of 160 feet.

### III. ALTERNATIVES

The following alternatives were considered, but no in-depth analysis of each was completed prior to the emergency action. Lack of such analyses does not preclude their inclusion here, or their consideration in future site planning for the Beardstown area.

A. Alternative 1 - (Preferred Alternative). Place the material at the closest suitable site, given the emergency nature of the situation and lack of time for thorough site assessment.

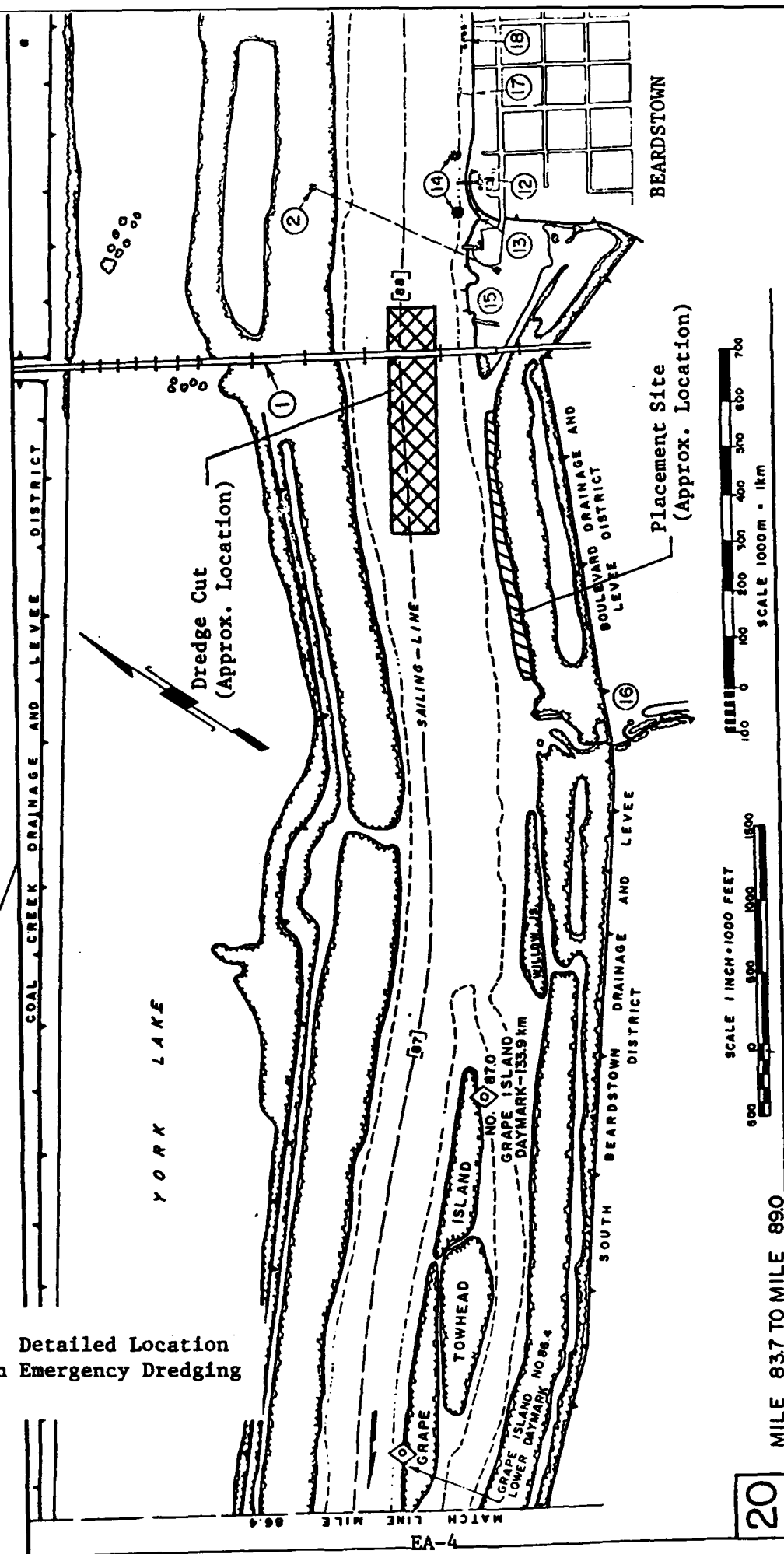
B. Alternative 2 - Grape Island. The OSIT considered placing a portion of the material on Grape Island (approximately 800 to 1,000 yards downstream from the preferred site), with the remainder being placed at the preferred site.

C. Alternative 3 - Beneficial Use Sites. Ongoing studies in the Beardstown are looking at suitable sites for beneficial use, such as strengthening levees, filling borrow pits, beach enrichment, or island creation on backwater lakes. Such beneficial use sites have yet to be identified, but future site plan formulation should continue to emphasize these alternatives.

D. Alternative 4 - Bankline Placement. This method of placement has been used previously on the Illinois Waterway, but has become increasingly undesirable due to wildlife habitat and vegetation impacts, as well as erosion and subsequent redeposition of material back to the river channel.

E. Alternative 5 - No Action. This alternative implies that the Corps of Engineers would not become involved in maintaining adequate, and mandated, channel depths for commercial navigation. In this case, there was

FIGURE EA-2. Detailed Location of Beardstown Emergency Dredging Action.





an imminent threat of channel blockage and thus serious disruption to commercial navigation.

The emergency action taken avoided the loss of life or potential personal injury that may have resulted from channel closure and subsequent groundings of vessels. Dredging needed to be undertaken immediately, and, therefore, the no action alternative was not feasible.

#### IV. AFFECTED ENVIRONMENT

The immediate environment affected in this action is entirely aquatic, comprising a surface area of approximately 3.7 acres. The deposition has essentially created a shoreline extension and abuts private land. The surrounding land areas are either undeveloped lowlands or in agricultural use behind the levee.

#### V. ENVIRONMENTAL IMPACTS OF THE PREFERRED ALTERNATIVE

Impacts associated with the preferred alternative are limited to the Illinois River system.

A. Air and Noise Quality. Limited air pollution effects from machinery exhaust were produced during the dredging operation, as well as noise from the dredge itself. No heavy machinery was used on shore to move or shape the dredged material. As a result, impacts to air and noise levels were minimized. The surrounding area is agricultural/undeveloped, and impacts were minimal and short-term in nature.

B. Water Quality. As with any dredging activity, temporary disruption of water quality was experienced, in terms of increased turbidity, during the deposition of material. Sediment analysis was conducted prior to dredging, and the results indicated that the material was primarily sand, with the percentage of small soil particles well below the limits required by the State of Illinois for further pre-dredging analysis.

Additional water quality testing was conducted during the dredging operation at the pipe outlet and at 300, 600, and 1,200 feet downstream from the outlet. Samples were analyzed for heavy metals and ammonia, and the results indicated no elevated levels of any of the tested substance. There were some indications of high lead levels, but these were equivalent to background samples taken upstream of the dredging operation.

C. Aquatic Community. Certainly this action impacted aquatic and benthic organisms and habitat, but the quality and quantity of these impacts cannot be determined with certainty. A major concern, as expressed in prior coordination, was the possible presence of significant mussel beds at the placement site and downstream in the Grape Island side channel. The

Illinois Department of Conservation (IDOC) surveys made prior to the placement action (late April 1991) revealed no commercially valuable or rare mussel resources at the site.

Downstream, historical records (Starrett, 1971) indicated the presence of a commercially valuable mussel bed. Numerous inquiries were made with personnel from the IDOC and the Illinois Natural History Survey, as well as a private mussel buyer who is well-acquainted with the area. Though mussels are likely present in the side channel, indications are that their numbers are not significant. Nonetheless, the channel will continue to be monitored and, if deemed necessary, further mussel survey work will be undertaken.

It is likely that the placement site will remain stable and soon be colonized by willows (*Salix* spp.) and other flood-tolerant species. The loss of open water is an impact in itself, and changes in flow regime could result from this action.

D. Terrestrial Habitat and Wildlife. Since this placement action took place entirely along the shoreline, impacts on terrestrial habitat and wildlife would be minimal or nonexistent. Though no prior surveys confirmed their presence, bank-dwelling mammals would have been impacted had they been present. A potential would exist for increased shorebird nesting sites, although predation would likely be a serious threat to their success.

E. Threatened and Endangered Species. Coordination with the U.S. Fish and Wildlife Service and the IDOC (Appendix A) indicates that no threatened or endangered species were impacted by this action. Both the federally endangered bald eagle (*Haliaeetus leucocephalus*) and Indiana bat (*Myotis sodalis*) occur in the project area. The bald eagle is a winter resident and would not have been present at the time of dredging. The Indiana bat is found mainly in small stream corridors and primarily would be impacted due to tree clearing, none of which occurred during this placement action.

A federally threatened plant, the decurrent false aster (*Boltonia decurrens*), was considered as possibly occurring in the vicinity of the placement. The plant is a floodplain species and has occurred sporadically along the Illinois River. Inquiries with IDOC Endangered Species Program personnel indicated that no location records existed for the plant in the Beardstown area, and, thus, impacts were not likely. The site, however, should be monitored in the future (particularly if this or adjacent sites are considered for additional dredged material placement) for the presence of the decurrent false aster, as it is known to readily colonize disturbed areas.

F. Historic Properties. On March 6, 1991, the Corps of Engineers notified the Illinois State Historic Preservation Officer (SHPO) of the proposed new dredged material placement site, promulgated under Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation 36 CFR Part 800: "Protection of Historic

Properties." The SHPO stated that the proposed placement has the potential for containing significant prehistoric/historic archaeological resources (see Appendix A) and recommended a Phase I archaeological reconnaissance survey.

A Phase I survey was contracted with the Illinois State Museum, Springfield, Illinois, and conducted by professional archaeologists. This survey was documented by the Illinois State Museum in an Archaeological Survey Short Report (ASSR). The ASSR was sent to the SHPO with the Corps of Engineers determination that the dredged material location has a very low probability of containing archaeological resources. On October 17, 1991, the SHPO determined that the ASSR and the Corps' determinations were adequate and that no significant historic, architectural, and archeological resources were located in the project area (see Appendix A), fulfilling the requirements set forth under Section 106 of the National Historic Preservation Act, as amended.

## VI. SOCIOECONOMIC IMPACTS OF THE PREFERRED ALTERNATIVE

A. Community and Regional Growth. No negative impacts resulted from the action relative to community or regional growth. Should other alternatives be pursued in the future, for example, suitable upland placement sites, growth could be enhanced by possible industrial or commercial uses of dredged material or sites.

B. Displacement of People. No displacement of people occurred as a result of this action.

C. Displacement of Farms. No displacement of farms occurred as a result of this action.

D. Community Cohesion. Placement at this site did not affect community cohesion.

E. Property Values and Tax Revenues. Illinois law mandates that landowners adjacent to the Illinois River retain ownership rights to mid-channel. Thus, the material deposited in this action becomes an extension of the property that it abuts. Although the potential exists for increased value of the site, it is unlikely that property values and tax revenues will be significantly affected by the addition of this land.

F. Aesthetic Values. Though the area surrounding the placement site has very little development other than for agricultural purposes, the material nonetheless presents an obvious visual impact, particularly when viewed from the nearby Highway 67 bridge. As vegetation gradually becomes established on the site, its visual contrast should become less apparent.

G. Life, Health, and Safety. The placement method used was typical of hydraulic dredging operations and posed no threat to the life, health, or safety of persons who may have used or will be using this site.

H. Employment and Labor Force. The action did not have a significant impact on employment or the labor force other than the temporary small impact due to the dredging itself.

I. Business and Industrial Development. No business or industrial facilities were impacted by this action.

J. Public Facilities and Services. The project has positive impacts on public facilities and services. Maintenance of the 9-foot channel is essential for commercial navigation on the Illinois Waterway.

K. Noise Levels. Due to the lack of residential development in the project vicinity, the temporary increase in noise levels during construction did not significantly affect the surrounding population.

#### VII. ENVIRONMENTAL IMPACTS OF NONPREFERRED ALTERNATIVES

A. Grape Island Placement. The island is a considerable distance (800 to 1,000 feet) from the dredging site and presented the same problem with other upland placement sites in terms of impacts to trees. There also was a threat to closure of the side channel itself.

B. Beneficial Use Sites. Since suitable sites have yet to be identified, potential impacts remain in terms of effects on bottomland hardwood stands. Access to potential sites (in terms of proximity to dredging locations and reach of equipment) also remains a hindrance.

C. Bankline Placement. Unacceptable impacts to wildlife and vegetation, as well as erosion of deposited material, increasingly rule out this placement method.

D. No Action. The no action alternative implies that adequate maintenance of navigation will not be considered in cases where channel closure is imminent. The result would be serious disruption to commercial navigation and threats to life and property, and therefore this alternative is unacceptable.

#### VIII. ADVERSE ENVIRONMENTAL EFFECTS WHICH COULD NOT BE AVOIDED

Emergency actions by their very nature will likely present unavoidable impacts. In this instance, near-shore aquatic habitat was lost and a narrowing of the river channel, albeit small, was realized.

Given the immediate need for the action and a minimum of prior OSIT assessment of possible site alternatives, these impacts should be considered unwanted consequences of the need to maintain navigation and the difficulty of managing placement sites on a long-term basis.

#### **IX. RELATIONSHIP BETWEEN SHORT-TERM USE AND LONG-TERM PRODUCTIVITY**

The short-term use of this placement site is for the removal of dredged material from the river channel. Long-term productivity will be determined by the degree of development which may occur on the site. If no development occurs, long-term productivity of this site as it contributes to the local economy would be negligible.

#### **X. IRREVERSIBLE OF IRRETRIEVABLE COMMITMENTS OF PROJECT IMPLEMENTATION**

The loss of aquatic habitat is an irretrievable commitment, as is the additional constriction created on the river channel.

#### **XI. RELATIONSHIP TO LAND-USE PLANS**

Without a clear picture of landowner intentions to utilize this site, it is difficult to relate it to land-use plans. As stated earlier, industrial or commercial development is unlikely in the vicinity of the placement site, and depending on if or when formal recreational use occurs, it is probable that some clearing of vegetation would need to take place.

Should suitable arrangements be made, and unavailability of sites continues to be a problem in the Beardstown area, the possibility exists for re-using this site for future dredged material placement. The OSIT will need to give this option further consideration in the near future.

#### **XII. COMPLIANCE WITH ENVIRONMENTAL QUALITY STATUTES**

Compliance with WRC-designated environmental statutes is summarized in table EA-1.

#### **XIII. PUBLIC INVOLVEMENT AND COORDINATION**

Coordination was initiated prior to this emergency action, and continued as it became apparent that the situation constituted an emergency.

Coordination was completed as necessary during the preparation of this document. Agencies contacted included the following (see appendix A):

Illinois Historic Preservation Agency  
Illinois Environmental Protection Agency  
United States Environmental Protection Agency  
Illinois Department of Conservation  
United States Fish and Wildlife Service  
Illinois Department of Transportation

To the degree possible, agency concerns have been addressed in this EA, but clearly none of the involved parties agree that this placement action produced a desirable result. The OSIT will continue to evaluate sites which hopefully minimize further impacts to the Illinois Waterway.

#### XIV. LITERATURE CITED

Starrett, W.C. 1971. A survey of the mussels (*Unionacea*) of the Illinois River: A polluted stream. Ill. Nat. Hist. Surv. Bull., V.30, Art. 5.

TABLE EA-1

Compliance of the Preferred Plan with  
WRC-Designated Environmental Statutes

<u>Federal Policies</u>	<u>Compliance</u>
Archeological and Historic Preservation Act, 16 U.S.C. 469, et seq.	Full compliance
Clean Air Act, as amended, 42 U.S.C. 165h-7, et seq.	Full compliance
Clean Water Act (Federal Water Pollution Control Act) 33 U.S.C. 1251, et seq.	Full compliance
Coastal Zone Management Act, 16 U.S.C. 1451, et seq.	Not applicable
Endangered Species Act, 16 U.S.C. 1531, et seq.	Full compliance
Estuary Protection, 16 U.S.C. 1221, et seq.	Not applicable
Federal Water Project Recreation Act, 16 U.S.C. 460-1(12), et seq.	Full compliance
Fish and Wildlife Coordination Act, 16 U.S.C. 661, et seq.	Full compliance
Land and Water Conservation Fund Act, 16 U.S.C. 4601, et seq.	Full compliance
Marine Protection Research and Sanctuary Act, 33 U.S.C. 1401, et seq.	Not applicable
National Environmental Policy Act, 42 U.S.C. 4321, et seq.	Full compliance
National Historic Preservation Act, 16 U.S.C. 470a, et seq.	Full compliance
River and Harbors Act, 33 U.S.C. 401, et seq.	Full compliance
Watershed Protection and Flood Prevention Act, 16 U.S.C. 1001, et seq.	Full compliance
Wild and Scenic Rivers Act, 16 U.S.C. 1271, et seq.	Not applicable

## NOTES:

- a. Full compliance. Having met all requirements of the statute for the current stage of planning (either preauthorization or postauthorization).
- b. Partial compliance. Not having met some of the requirements that normally are met in the current stage of planning. Partial compliance entries should be explained in appropriate places in the report and referenced in the table.
- c. Noncompliance. Violation of a requirement of the statute. Noncompliance entries should be explained in appropriate places in the report and referenced in the table.
- d. Not applicable. No requirements for the statute required; compliance for the current stage of planning.

FINDING OF NO SIGNIFICANT IMPACT  
FOR  
BEARDSTOWN EMERGENCY DREDGING ACTION  
RM 87.7, LB, ILLINOIS RIVER  
CASS COUNTY, ILLINOIS

Having reviewed the information contained in this Environmental Assessment, I find that the emergency dredging action conducted at Beardstown, Cass County, Illinois, June 19-24, 1991, did not have significant impacts on the environment. The action was not a major Federal action, and, therefore, preparation of an Environmental Impact Statement (EIS) was not required. This decision may be reevaluated if warranted by later developments.

Factors that were considered in making this determination that an EIS is not required were:

- a. Though irreversible impacts did occur to aquatic habitat, no significant long-term impacts are expected to result.
- b. No significant social, economic, environmental, or cultural impacts occurred as a result of this action.

---

Date

John R. Brown  
Colonel, U.S. Army  
District Engineer



PERTINENT CORRESPONDENCE

A

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**Illinois Historic  
Preservation Agency**

Old State Capitol      Springfield, Illinois 62701      (217) 782-4836  
Suite 4-900      State of Illinois Center      100 W. Randolph      Chicago, IL 60601      (312) 814-1409

217/785-4997

CARROLL COUNTY  
Dredged material placement site  
Beardstown

PLEASE REFER TO:  
IHPA LOG #910318002JAW

April 8, 1991

Mr. Dudley M. Hanson, P.E.  
Chief, Planning Division  
U.S. Army Engineer District, Rock Island  
Clock Tower Building - Post Office Box 2004  
Rock Island, Illinois 61204-2004

Dear Sir:

Thank you for requesting comments from our office concerning the possible effects of the project referenced above on cultural resources. Our comments are required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties".

The project area has a probability of containing significant prehistoric/historic archaeological resources. Although there are no archaeological sites in the project area or immediately adjacent, the potential for undisturbed cultural resources is present. Duane Esarey, in his low water bank survey of the Illinois River identified archaeological sites in similar environmental locales. Accordingly, a Phase I archaeological reconnaissance survey to locate, identify, and record all archaeological resources within the 3.7 acre proposed dredged material placement site will be required. This decision is based upon our understanding that there has not been any large scale disturbance of the ground surface (excluding agricultural activities) or major construction activity within the project area which would have destroyed existing cultural resources. If the area has been disturbed, please contact our office with appropriate documentation.

Enclosed you will find an attachment briefly describing Phase I surveys and listing archaeological contracting services. A copy of our letter should be provided to the selected professional archaeological contractor for their information.

If you have any further questions, please contact Joyce A. Williams, Staff Archaeologist, Illinois Historic Preservation Agency, Old State Capitol, Springfield, Illinois 62701, 217/785-1279.

Sincerely,

Theodore W. Hild  
Deputy State Historic  
Preservation Officer

TWH:JAW:bb1028A/81

Enclosure: Additional Information Sheet on A-1  
Archaeological Surveys and Contracting Services



# Illinois Department of Transportation

Division of Water Resources  
3215 Executive Park Drive / P.O. Box 19484 / Springfield, Illinois / 62794-9484

**NOTE:**  
Address Change

April 22, 1991

District Engineer  
U. S. Army Engineer District, Rock Island  
ATTN: Planning Division  
Clock Tower Building, P. O. Box 2004  
Rock Island, Illinois 61204-2004

Attention: Dudley M. Hanson, P.E.

Gentlemen:

Thank you for your April 2, 1991 letter providing us with the opportunity to comment on the proposed development of a new dredged material placement site on the eastern bank of the Illinois River just downstream from the Beardstown bridge.

Provided the dredged material would be placed in accordance with the terms and conditions of Illinois Department of Transportation, Division of Water Resources Permit No. 17603, we would have no objections to the use of this new site. However, anything beyond that would require an individual permit. Considering the large amount of development pressure within the Illinois River floodway in the Beardstown area and the potential cumulative impacts on floodway storage and conveyance capacities, it is unlikely that any appreciable spoil depth would be permissible.

You may wish to consider a disposal site outside of the floodway. Enclosed for your information is a copy of a March 3, 1991 application for permit we received from Mr. Kenneth O'Hara to place fill in an area close to the proposed site but outside of the floodway. If your Regulatory Branch determines Mr. O'Hara's site to be acceptable from a wetlands' standpoint, it is suggested that you contact him about the possibility of placing dredged material on his property.

Please feel free to contact Mike Diedrichsen or me if you have any questions or comments. One or both of us would be willing to meet with you again at the site to discuss any problems.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Dennis L. Kennedy'.

Dennis L. Kennedy, P.E., Head  
Technical Analysis and Permit Unit



## United States Department of the Interior

Fish and Wildlife Service  
Rock Island Field Office (ES)  
1830 Second Avenue, Second Floor  
Rock Island, Illinois 61201



In Reply Refer to:

COM: 309/793-5800  
FTS: 782-5800

May 1, 1991

Mr. Dudley M. Hanson  
Chief, Planning Division  
U.S. Army Engineer District  
Rock Island  
Clock Tower Building, P.O. Box 2004  
Rock Island, Illinois 61204-2004

Dear Mr. Hanson:


This is in response to your letter dated April 2, 1991, requesting our comments on your agency's proposal to dispose of dredged material along the left bank at Illinois River mile 87.5-87.8 near Beardstown, Illinois. The material will be placed below the ordinary high water line. You indicated that the On-Site Inspection Team (OSIT) indicated its approval for using the site.

The OSIT does not object to using the site because the OSIT has no choice. As we have stated at nearly every OSIT meeting for dredging on the Illinois River, we are opposed to the placement of dredged material below the ordinary high water line and would prefer that it be placed out of the floodplain. In fact, we would even prefer that it be placed back into the trees away from the river's edge. We believe that the impacts of shoreline disposal of dredged material are greater than those associated with disposal among the trees. Not only does shoreline disposal cover and destroy near-shore benthic habitat and act to further constrict the river, but the material may re-enter the aquatic system during high flows, exacerbating the need to dredge again.

However, due to the fact that the Corps must comply with the conditions of its Division of Water Resources permit, the only alternative to shoreline disposal is to go out of the floodplain. Such sites are virtually non-existent, although we understand that your office is pursuing long-term out-of-floodplain disposal areas for this and other chronic dredging sites. We commend this effort and encourage you to proceed in all haste.

If you have any questions, please contact Gerry Bade of this office.

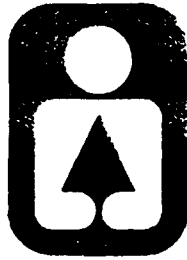
Sincerely,

  
Richard C. Nelson  
for Field Supervisor

cc: IDOC (Schanzle, Sallee)  
USEPA (Fenedik)  
ILEPA (Yurdin)  
IDOT/DOWR (Kennedy)

GB:hw

Illinois



# Department of Conservation

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CHICAGO OFFICE • ROOM 4-300 • 100 WEST RANDOLPH 60601

BRENT MANNING, DIRECTOR

May 2, 1991

Mr. Dudley M. Hanson, P.E.  
Chief, Planning Division  
Department of the Army  
Rock Island District, Corps of Engineers  
Clock Tower Building, P.O. Box 2004  
Rock Island, Illinois 61204-2004

Dear Mr. Hanson:

Reference is made to your letter of April 2, 1991 concerning the Rock Island District's proposed development of a dredged material placement site on the Illinois River in the vicinity of river mile 87.7, left bank, at Beardstown, Cass County, Illinois.

As you know, the Department of Conservation currently chairs the Illinois River On-site Inspection Team (OSIT) for dredged material disposal. The OSIT End-of-Season reports for 1987, 1989 and 1990 have all recommended that the Rock Island District pursue the development of an upland disposal site in the Beardstown area because of the increasing need for dredging in this reach and concerns about placing the dredged material back in the river or in adjacent wetlands. While your letter accurately states that the OSIT, including the Department of Conservation, "did not object to using the (proposed) site as a dredged material placement site" at its November 21, 1990 meeting in Beardstown, the Department's first preference remains the development of an upland site.

Staff in attendance at the November 21, 1990 meeting agreed to conduct a survey at the proposed disposal site to insure that no significant mussel resources will be impacted by possible future disposal operations. On April 24, 1991 Department biologists made six three-minute hauls at the site with a five-foot crowfoot brail, resulting in the collection of one Anodonta grandis, one Anodonta imbecillis, one Leptodea fragilis, one Obliquaria reflexa, two Potamilus ohiensis and one Quadrula quadrula. The collection of this relatively small number of individuals all representing common species may indicate that no significant mussel populations are

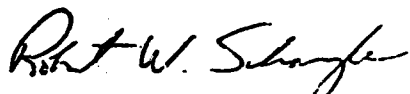
present in the immediate area of the disposal site. However, sampling conditions at the time of the survey were less than perfect because of high water conditions, and additional work is in order.

W.C. Starrett (1971) identified a commercially important mussel bed just downstream from the proposed disposal site (river miles 86.4 - 87.0, left bank) which may still be present. Though little can be concluded from our limited sampling, three brail hauls made at approximate mile 86.9 resulted in the collection of four Amblema plicata and one Leptodea fragilis. Since dredged material placed at the proposed disposal site could be washed downstream and blanket the bed if it still exists, we recommend that both the presence or absence of the mussel bed and the potential effects of dredged material transport be reviewed in your agency's Environmental Assessment. We will be pleased to assist your staff with additional survey activities as necessary.

As a final comment, the Department's Natural Heritage database has been reviewed to insure that no state listed threatened or endangered species will be affected by use of the proposed disposal site. While listed bird species have been observed at the nearby Beardstown Marsh, none of them are known to use the immediate project area. Therefore, we do not anticipate any adverse impacts to heritage resources.

We appreciate the opportunity to comment. Please contact me if we can provide further information or be of any other assistance.

Sincerely,



Robert W. Schanzle  
Permit Program Manager  
Division of Planning

RWS:ts

cc: DOWR (Kennedy)  
IEPA (Yurdin)  
INHS (Blodgett)  
USFWS (Bade)  
USEPA (Fenedick)



217/782-1696

Rock Island District Corps of Engineers  
Maintenance dredging - Illinois River  
Log # C-516-87

May 9, 1991

Mr. Dudley M. Hanson, P.E.  
Chief, Planning Division  
Rock Island Corps of Engineers  
Clock Tower Building, P.O. Box 2004  
Rock Island, Illinois 62706

Dear Mr. Hanson:

This responds to your request for comments of April 2, 1991 concerning the development of a new disposal site at Beardstown.

The criteria for developing and operating this site are specified within the Illinois Pollution Control Board variance order PCB 87-38 issued September 17, 1987, as it applies to the dredging site identified at river mile 88.5 to 89.5 [mouth of Sangamon River]. This order provides for certain investigative measures prior to dredging by which alternative methods and sites are evaluated [conditions 5 and 6]. Any dredging outside the areas covered by IPCB order 87-38 are subject to the Section 401 certification issued October 9, 1987 which requires similar investigations, including the analysis of sediment and the selection of a disposal site [conditions 5 and 6]. We request that these conditions be carefully considered in the preparation of the Environmental Assessment for this disposal area.

If you have questions on these matters, please contact Bruce Yurdin of my staff.

Very truly yours,

Thomas G. McSwiggin, P.E.  
Manager, Permit Section  
Division of Water Pollution Control

TGM:BY:rmi/1341q/27

cc: IEPA, Records  
IDOC  
USFWS Rock Island  
IDOT, DWR, Springfield





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

MAY 10 1991

5ME-16JCK

Colonel John R. Brown  
District Engineer  
U.S. Army Engineer District, Rock Island  
ATTN: Planning Division  
Clock Tower Building - P.O. Box 2004  
Rock Island, Illinois 61204-2004

Dear Colonel Brown:

We have reviewed your April 2, 1991 scoping letter concerning a new dredged material placement site near Beardstown, Illinois. There is need for development of placement sites along the Illinois River, and Beardstown is considered as high priority for a placement site. An environmental assessment (EA) will be prepared to assess environmental impacts associated with the Beardstown site.

Based on our review of the scoping letter, we have environmental concerns with the proposed dredged material placement site. The 80 foot wide by 2000 foot long strip along the riverbank proposed for the site is listed as forested wetland on National Wetlands Inventory maps. Impacts to this wetland can be avoided by selecting an alternative site further away from the river bank. If wetland impacts are unavoidable and result from the project, then the forested wetlands should be compensated at a minimum ratio of 3:1 of wetlands compensated to those impacted. This elevated ratio is to help ensure long-term success of the mitigation. The EA should assess total acreage of wetland impacts and determine whether any bottomland hardwoods would be involved.

We are also concerned with water quality and endangered species impacts. The EA should assess the potential of the presence of contaminants in sidecasted material, and the ability for these contaminants to become waterborne via runoff from the dredged material placement site. The EA should also assess impacts to endangered species in the area that may include raptors, bats, and mussels. These impacts should be mitigated in the EA.

Locating a dredged material placement site in close proximity to a borrow pit produces purpose and need questions for both the placement site and the borrow pit. The EA should discuss whether dredged material could be used as fill instead of taking material from the borrow pit. The EA should also consider the borrow pit as an alternative site for placement of dredged material.

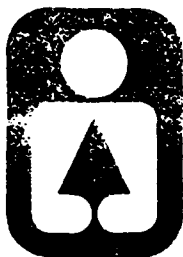
Thank you for the opportunity to review the proposal for a new dredged material placement site near Beardstown, Illinois. If you have any questions regarding our comments, please contact Milo Anderson of my staff at (312) 886-2967.

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'T. L. Jackson', with a stylized, flowing script.

Thomas L. Jackson, Chief  
Environmental Review Branch

Illinois



# Department of Conservation

life and land together

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CHICAGO OFFICE • ROOM 4-300 • 100 WEST RANDOLPH 60601

~~MARK SPENCER, DIRECTOR~~ ~~XXXX KATHY SLOANE, ASSISTANT DIRECTOR~~ ~~XXXX~~

Brent Manning, Director

May 13, 1991

Dudley M. Hanson, P.E.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
Rock Island District  
Clock Tower Building - P.O. Box 2004  
Rock Island, IL 61204-2004

Dear Mr. Hanson,

This is in reference to your letter to Vernon Kleen, dated April 2, 1991, in which you requested information about a proposed dredged material placement site near Beardstown. Mr. Kleen reviewed the site for potential impacts to birds and forwarded the letter to me for a formal response. I apologize for not meeting the deadline of May 10.

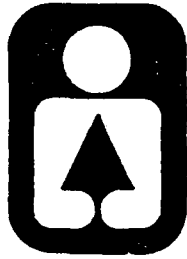
Natural Heritage staff has reviewed available information regarding the proposed site and can identify no problems. There are no known occurrences of threatened or endangered species and no trees will be adversely affected by the placement of the fill material.

Thank you for submitting this project for review prior to making a decision. If you need additional information or have any questions, please do not hesitate to contact me at 217-785-8290.

Sincerely,

Deanna Glosser, Ph.D.  
Endangered Species Protection  
Program Manager

Illinois



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BRENT MANNING, DIRECTOR

June 3, 1991

Colonel John R. Brown  
District Engineer  
Department of the Army  
Rock Island District, Corps of Engineers  
Clock Tower Building, P.O. Box 2004  
Rock Island, Illinois 61204-2004

Dear Colonel Brown:

In early April, 1991, the various agency representatives participating in the Illinois On-Site Inspection Team (OSIT) were asked by the Rock Island District to review a proposed dredged material placement site on the left descending bank of the Illinois River at approximate mile 87.7 in Beardstown, Cass County, Illinois. Their comments were solicited to assist your staff in the preparation of an Environmental Assessment and 404(b)1 evaluation for the site.

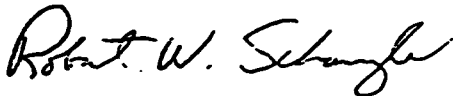
Among the specific concerns identified for your agency's investigation were 1) the possible presence of mussel resources in the project reach and 2) the potential for dredged material to migrate out of the placement site and impact areas downstream. It was recommended that additional mussel survey work be performed, particularly at the placement site and in the side channel at Grape Island (River mile 87.0) where W.C. Starrett reported a commercially valuable mussel bed in his 1971 work. It was also suggested that the potential impacts of dredged material transport be reviewed in the Environmental Assessment.

As OSIT Chairman, I was recently contacted by Rock Island District staff and informed that an emergency dredging situation has developed at Beardstown which will require that the proposed dredged material placement site be utilized before the Environmental Assessment is completed. This has been discussed with each of the OSIT members, and the Team wishes to make the following recommendations to reduce the possibility of inadvertent environmental damages.

- . In advance of the dredging, every effort should be made by the Rock Island District to secure information on the species richness and abundance of any mussel populations that may be present in the project area.
- . The dredged material placement site should be closely monitored by the Rock Island District during and after the dredging to determine whether any downstream migration of the dredged material is occurring. If migration is observed, steps should be taken by the Rock Island District to interdict the flow of dredged material before it affects mussel beds or important areas of aquatic habitat such as the Grape Island side channel.
- . Should efforts at interdiction fail and the Grape Island side channel or other important habitat areas be blanketed by dredged material, the Rock Island District should commit to their restoration via dredging and other measures as necessary.

The Illinois OSIT appreciates the opportunity to make these recommendations. Please contact me at 217/782-3715 if clarification is needed or if we may be of any other assistance.

Sincerely,



Robert W. Schanzle  
Chairman, Illinois OSIT

RWS:ts

cc: DOWR (Kennedy)  
INHS (Blodgett)  
IEPA (Yurdin)  
USFWS (Bade)  
USEPA (Fenedick)  
USCOE (Cox, Slater) ✓



**Illinois Historic  
Preservation Agency**

Old State Capitol      Springfield, Illinois 62701      (217) 782-4836

Suite 4-900      State of Illinois Center      100 W. Randolph      Chicago, IL 60601      (312) 814-1409

217/785-4997

**CASS COUNTY**

Dredge material placement site  
Beardstown

Illinois Waterway River Miles 87.45 to 87.9  
Dredge Site Mile 88.0

IHPA LOG #910625001TRW

Illinois State Museum Society

Acres: 3.7 Sites: 0

October 17, 1991

Mr. Dudley M. Hanson, P.E.  
Chief, Planning Division  
District Engineer  
U.S. Army Engineer District, Rock Island  
Attention: Planning Division  
Clock Tower Building - Post Office Box 2004  
Rock Island, Illinois 61204-2004

Gentlemen:

Thank you for submitting the results of the archaeological reconnaissance. Our comments are required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties".

Our staff has reviewed the archaeological Phase I reconnaissance report performed for the project referenced above.

The Phase I survey and assessment of the archaeological resources appear to be adequate. Accordingly, we have determined, based upon this report, that no significant historic, architectural, and archaeological resources are located in the project area.

Please retain this letter in your files as evidence of compliance with Section 106 of the National Historic Preservation Act of 1966, as amended.

Sincerely,

Theodore W. Hild  
Deputy State Historic  
Preservation Officer

TWH:TRW:bb/1155A/34

cc: Illinois State Museum Society

CONVERSATION RECORD		TIME 800	DATE 12/13/91
TYPE ( ) VISIT ( ) CONFERENCE (x) TELEPHONE		( ) INCOMING (x) OUTGOING	CF: ----- PDDist File PD-E
NAME CONTACTED Gerry Bade	ORGANIZATION U.S. Fish and Wildlife Service	TELEPHONE 309/793-5800	

SUBJECT: Coordination on Federally Threatened/Endangered Species

SUMMARY:

1. I called Mr. Bade to obtain information on federally listed threatened or endangered species which may have been impacted by the Beardstown emergency action. Such information was not contained in an initial coordination letter from FWS dated May 1, 1991. Mr. Bade said that the endangered bald eagle and Indiana bat could potentially inhabit the affected area. However, the bald eagle is present only during the winter, while the Indiana bat is found primarily along small stream corridors, and would only be impacted if trees were to be cleared. For these reasons Mr. Bade concurred that neither species was impacted by the disposal action.

2. Mr. Bade also mentioned the possibility of the decurrent false aster, a threatened plant, occurring in this area. He was unsure of documented records of its presence and upon my request, suggested that further information could be obtained from Ms. Deanna Glosser of the Illinois Department of Conservation.

ACTION REQUIRED:

Contact Deanna Glosser, IDOC, for further information on decurrent false aster.

NAME OF PERSON DOCUMENTING CONVERSATION RICHARD FRISTIK	SIGNATURE <i>Richard Fristik</i>	DATE 12/13/91
---	-------------------------------------	------------------

ACTION TAKEN

Information obtained via phone conversation with Deanna Glosser, 12/13/91

SIGNATURE <i>Richard Fristik</i>	TITLE General Biologist	DATE 12/13/91
50271-101		CONVERSATION RECORD (12-76)

CONVERSATION RECORD		TIME 1330	DATE 13 December 1991
TYPE ( ) VISIT ( ) CONFERENCE (x) TELEPHONE		(x) INCOMING ( ) OUTGOING	CF: ----- PDDist File PD-E
NAME CONTACTED Deanna Glosser	ORGANIZATION I.D.O.C.	TELEPHONE 217/785/8290	

SUBJECT: Presence of Decurrent False Aster in Beardstown Area

SUMMARY:

1. Following up on an earlier phone call, Ms. Glosser called to provide information on the possible presence of the decurrent false aster (state of Illinois endangered, federally threatened) in the vicinity of the disposal site at RM 87.7. Ms. Glosser stated that no records existed of the plant occurring in this area, and her consultation with a staff botanist (who is familiar with the area and this plant) confirmed these records. Ms. Glosser felt that this plant species was not impacted by the emergency disposal action, but agreed that the site should be monitored for its presence in the future, as it may readily colonize disturbed areas.

ACTION REQUIRED:

NAME OF PERSON DOCUMENTING CONVERSATION RICHARD FRISTIK, PD-E	SIGNATURE <i>Richard Fristik</i>	DATE 13 December 1991
---	-------------------------------------	--------------------------

ACTION TAKEN

SIGNATURE	TITLE	DATE
50271-101	CONVERSATION RECORD	(12-76)





REPLY TO  
ATTENTION OF:

CENCR-PD-E

DEPARTMENT OF THE ARMY  
ROCK ISLAND DISTRICT, CORPS OF ENGINEERS  
CLOCK TOWER BUILDING - P.O. BOX 2004  
ROCK ISLAND, ILLINOIS 61204-2004

CLEAN WATER ACT  
SECTION 404(b)(1) EVALUATION

BEARDSTOWN EMERGENCY DREDGING ACTION  
RM 87.7, LB, ILLINOIS RIVER  
CASS COUNTY, ILLINOIS

FEBRUARY 1992

CLEAN WATER ACT  
SECTION 404(b)(1) EVALUATION

BEARDSTOWN EMERGENCY DREDGING ACTION  
RM 87.7, LB, ILLINOIS RIVER  
CASS COUNTY, ILLINOIS

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CLEAN WATER ACT  
SECTION 404(b)(1) EVALUATION

BEARDSTOWN EMERGENCY DREDGING ACTION  
RM 87.7, LB, ILLINOIS RIVER  
CASS COUNTY, ILLINOIS

SECTION 1 - PROJECT DESCRIPTION

LOCATION

The dredged material placement site is located adjacent to private property at Illinois River Mile 87.4-87.7, left descending bank, near Beardstown, Cass County, Illinois (figure 1).

GENERAL DESCRIPTION

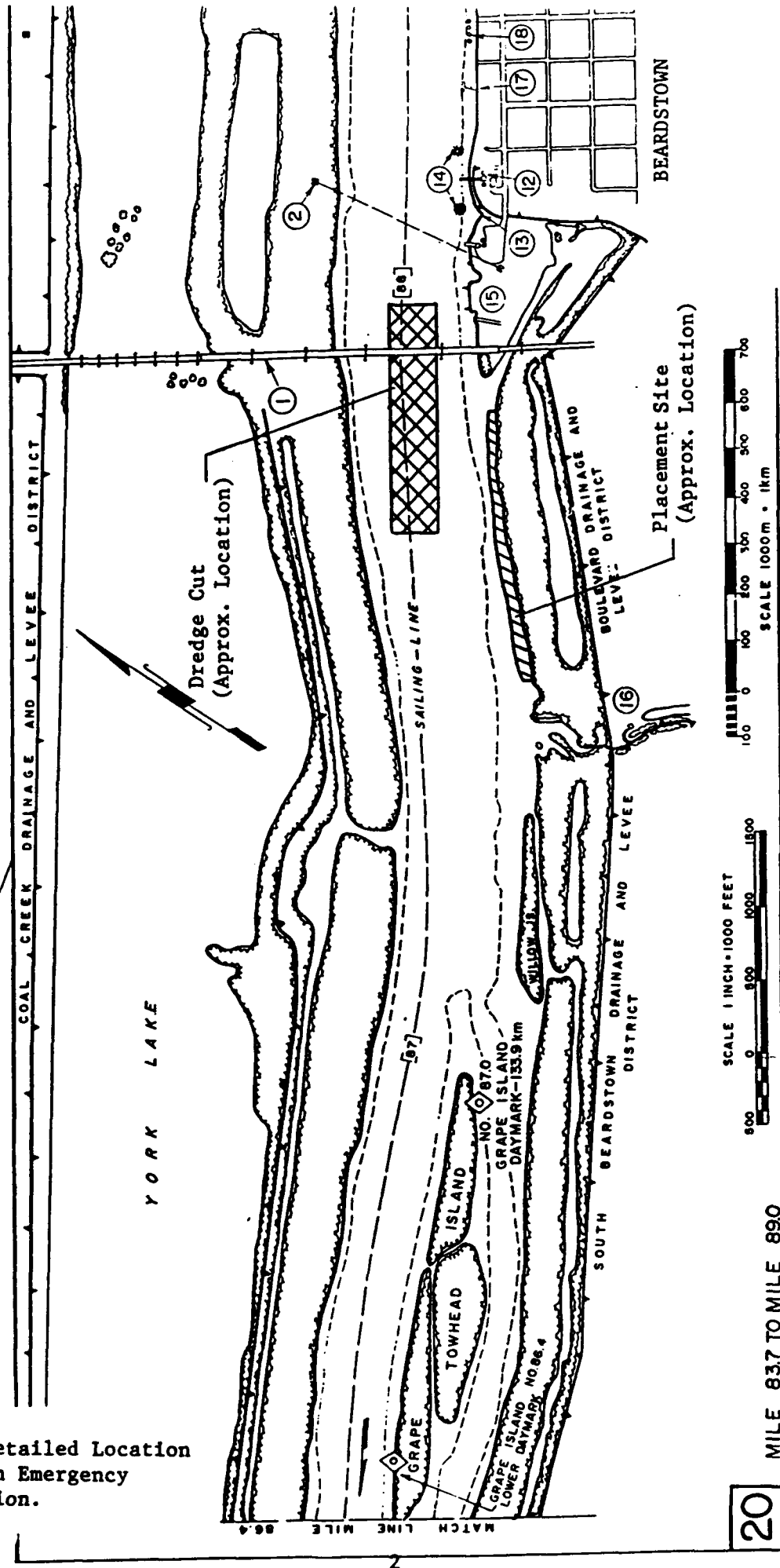
A rapid and severe shoaling event near the confluence of the Sangamon and Illinois Rivers, with subsequent reduction in navigation channel depth, resulted in an emergency declaration and immediate dredging action. Time constraints allowed only limited evaluation of potential placement sites and coordination on possible environmental effects. Suitable placement sites are becoming increasingly scarce in the Beardstown area, but intense investigation for long-term sites is currently under way.

AUTHORITY AND PURPOSE

Overall authority for maintenance dredging on the Illinois Waterway within district boundaries by the Corps of Engineers, Rock Island District, is given under the Illinois Waterway Nine-Foot Channel Navigation project. Provisions for emergency declarations by the District Engineer are included in ER 200-2-2, 33 CFR 230.8. The purpose of this action was to remove material as expeditiously as possible in order to maintain navigation and to prevent damage to life or property. This evaluation will address impacts associated with the completed placement action.

An On-Site Inspection Team (OSIT) comprised of representatives from the Illinois Department of Transportation, Division of Water Resources; Illinois Natural History Survey; Illinois Environmental Protection Agency; U.S. Environmental Protection Agency; U.S. Fish and Wildlife Service; Illinois Department of Conservation; and U.S. Army Corps of Engineers

FIGURE 1. Detailed Location of Beardstown Emergency Dredging Action.



was formed to evaluate potential placement sites and help develop a long-term strategy for placement alternatives.

The OSIT reviewed the placement site used in this action, and, with some reservations, approved of its use.

#### GENERAL DESCRIPTION OF DREDGED AND FILL MATERIAL

The site under consideration has been dredged almost yearly since 1987. This action resulted in 57,600 cubic yards of material being dredged. The material was almost entirely sand, with a maximum of 2.3 percent passing through a No. 230 sieve.

#### DESCRIPTION OF DISCHARGE SITE

The site is approximately 3.7 acres in size and 60-100 feet wide by 2,000 feet long. The material was deposited entirely in the water and now adjoins and in effect extends private land (figure 1).

#### DESCRIPTION OF PLACEMENT METHOD

Dredging was done with the 20-inch cutterhead dredge THOMPSON, utilizing a floating discharge pipe and a discharge rate of 1,000 cubic yards per hour. Dredging was completed over a period of 6 days, June 19-24, 1991.

### SECTION 2 - FACTUAL DETERMINATIONS

#### PHYSICAL SUBSTRATE DETERMINATIONS

Actual particle size composition of the substrate cannot be determined since appropriate analysis was not completed prior to dredging.

#### WATER CIRCULATION AND FLUCTUATION DETERMINATIONS

The placement action did not likely affect the water chemistry, temperature, dissolved gas levels, nutrient levels, or eutrophication potential of the river. If impacts did occur, they were limited in scope and duration. Sounding data from October 1990 and May 1991 revealed that

the approximate maximum water depth reached by the material was 5.3 feet below flat pool elevation of 429.0 feet MSL.

Minor changes in current patterns and flows typically result from dredging actions, and such changes could be expected due to the material deposition itself. The extent of these changes is difficult to determine, since data on these parameters is somewhat incomplete.

The placement site is below the normal high water mark (as permitted under Corps of Engineers authority for navigational servitude). Effects of the site on water reach during flooding would likely be insignificant.

#### SUSPENDED PARTICULATE AND TURBIDITY DETERMINATIONS

Turbidity was temporarily increased during deposition of material, as is the case with most dredging operations. Since the material was predominantly sand, settling rates were rapid. Long-term increases in turbidity should not occur if the material remains stable.

#### ACTIONS TAKEN TO MINIMIZE IMPACTS

Though the amount dredged was larger than anticipated, no over-dredging occurred.

#### CONTAMINANT DETERMINATIONS

Water quality and sediment analyses did not indicate any threat of contamination.

#### AQUATIC ECOSYSTEM DETERMINATIONS

Impacts to plankton, nekton, and benthos certainly occurred, but impacts were short-term, and each of these elements likely recovered rapidly.

#### PLACEMENT SITE DETERMINATIONS

Aside from temporary effects on turbidity, water quality standards were not violated. State of Illinois certification under Section 401 of the Clean Water Act existed prior to the action, and all requirements under the Act were met relative to this action.

No adverse impacts were realized to water-based recreation, municipal or private water supplies, recognized natural or cultural resources, or commercial fisheries. Some impacts did occur in terms of aesthetics and possibly recreational fisheries.

#### DETERMINATION OF CUMULATIVE OR SECONDARY EFFECTS ON THE AQUATIC ECOSYSTEM

The dredging action is not expected to have any cumulative effects on the aquatic ecosystem. The degree to which the site stabilizes will determine possible resuspension of the material, and future monitoring will attempt to minimize the effects of such movement should it occur.

#### SECTION 3 - FINDINGS OF COMPLIANCE OR NONCOMPLIANCE WITH THE RESTRICTIONS ON DISCHARGE

1. No significant adaptations of the guidelines were made relating to this evaluation.
2. Alternatives which were considered in addition to the selected action were as follows:
  - a. Grape Island placement
  - b. Bankline placement
  - c. Beneficial use sites
  - d. No Federal action
3. Certification under Section 401 of the Clean Water Act was obtained from the Illinois Environmental Protection Agency. The project was thus in compliance with requirements of the State of Illinois.
4. The project did not introduce toxic materials into Illinois River waters or other waterways.
5. There were no impacts to State or federally listed threatened or endangered species.
6. The project is located along a freshwater, inland river system, and thus no marine sanctuaries were involved.
7. No municipal or private water supplies were affected. Recreational fishing may have been adversely impacted, but no other impacts to the river ecosystem were thought to have occurred.

8. The deposited material is chemically stable. Physical stability will continue to be monitored and efforts taken to minimize possible contamination effects from material resuspension.

9. Based on the guidelines, the project is considered to be in compliance with Section 404(b)(1) of the Clean Water Act, as amended.

10. The project did not significantly impact water quality or the integrity of the aquatic ecosystem.

---

Date

John R. Brown  
Colonel, U.S. Army  
District Engineer



DISTRIBUTION LIST

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 RM 87.7, LB, ILLINOIS RIVER  
 CASS COUNTY, ILLINOIS  
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REGION V, 175 W JACKSON BLVD - 4TH FLOOR  
CHICAGO IL 60604

REGIONAL ENGINEER, FERC REGIONAL OFFICE  
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DIVISION ADMINISTRATOR, FEDERAL HIGHWAY ADMIN  
320 W WASHINGTON STREET, ROOM 700  
SPRINGFIELD IL 62701

MR RICHARD NELSON - FIELD SUPRVR, U.S.FISH & WILDLIFE SERVICE  
4469 48TH AVENUE COURT, ROCK ISLAND IL 61201

CHARLES WHITMORE, STATE CONSERVATIONIST  
SOIL CONSERVATION SERVICE, 1902 FOX DRIVE  
CHAMPAIGN IL 61820 2

MR JON DUVVEJONCK, UPPER MISSISSIPPI RIVER  
CONSERVATION COMMITTEE, 4469 48TH AVE COURT  
ROCK ISLAND IL 61201

REGIONAL DIRECTOR, U.S. FISH AND WILDLIFE SERVICE  
FEDERAL BLDG FORT SNEILING, TWIN CITIES MN 55111

REGIONAL FORESTER, FOREST SERVICE  
US DEPT OF AGRICULTURE, 310 W WISCONSIN AVE-SUITE 500  
MILWAUKEE WI 53203 2

COMMANDER, US ARMY ENGINEER DIVISION  
NORTH CENTRAL, 111 N CANAL - 12TH FLOOR  
CHICAGO IL 60606-7206

OFFICE OF THE GOVERNOR, ATTN: TOM BERKSHIRE  
STATE OF ILLINOIS, SPRINGFIELD, IL 62708

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JERSEYVILLE IL 62052

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VIRGINIA, IL 62691

COUNTY CLERK, CASS COUNTY COURT HOUSE  
VIRGINIA, IL 62691

COUNTY ENGINEER, CASS COUNTY COURT HOUSE  
VIRGINIA, IL 62691

DIRECTOR, BEARDSTOWN COMMUNITY PARK, DISTRICT, BOX 226  
BEARDSTOWN, IL 62618

MAYOR, BEARDSTOWN CITY HALL  
BEARDSTOWN, IL 62618

JOHN W WINSTON, SECRETARY-TREASURER  
COAL CREEK DR & LEVEE DISTRICT, 108 E 6TH ST  
BEARDSTOWN IL 62618

NORMAN KORSMEYER, CHAIRMAN & COMMISSIONER  
CLEAR LAKE SP DR DISTRICT, RR 2 BOX 146A  
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BUREAU OF FARMLAND PROTECTION, STATE FAIRGROUNDS  
SPRINGFIELD IL 62706

MR G GRENT MANNING-DIRECTOR, ILLINOIS DEPT OF CONSERVATION  
LINCOLN TOWER PLAZA, 524 SOUTH 2ND STREET  
SPRINGFIELD IL 62701-1787

JAMES C SLIFER, IL DEPT OF TRANSPORTATION  
ATTN BUREAU OF PLANNING, 126 E ASH STREET  
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